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12 UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
14 WESTERN DIVISION

15 UNITED STATES OF AMERICA,  
16 Plaintiff,  
17 v.  
18 \$63,353.86 IN BANK FUNDS,  
19 Defendant.

No. 2:22-cv-04423

**VERIFIED COMPLAINT FOR  
FORFEITURE**

18 U.S.C. §§ 981(a)(1)(A) and (C)  
and 984

[F.B.I.]

22 Plaintiff United States of America brings this claim against defendant \$63,353.86  
23 in Bank Funds (the “defendant bank funds”), and alleges as follows:

24 **JURISDICTION AND VENUE**

25 1. The government brings this in rem civil forfeiture action pursuant to 18  
26 U.S.C. §§ 981(a)(1)(A) and (C) and 984.

27 2. This Court has jurisdiction over the matter pursuant to 28 U.S.C. §§  
28

1 1345 and 1355.

2 3. Venue lies in this district pursuant to 28 U.S.C. § 1395(b).

3 **PERSONS AND ENTITIES**

4 4. The plaintiff in this action is the United States of America.

5 5. The defendant in this action is \$63,353.86 in Bank Funds, seized pursuant  
6 to a federal seizure warrant on November 20, 2017 from a Comerica Bank account with  
7 the last four digits of 8506. The defendant bank funds were held in the name of  
8 Oneworld Financial Holding Group Co Ltd and were seized at Comerica Bank located at  
9 13200 Crossroads Parkway North, Suite 100, City of Industry, California.

10 6. The defendant bank funds are currently in the custody of the United States  
11 Marshals Service in this District, where they shall remain subject to this Court's  
12 jurisdiction during the pendency of this action.

13 7. The interests of Oneworld Financial Holding Group Co Ltd ("Oneworld")  
14 and Zhili Song, aka Ethan Song, may be adversely affected by these proceedings.

15 **FACTS SUPPORTING FORFEITURE**

16 *Background of Investigation*

17 8. The Federal Bureau of Investigation ("FBI") conducted an investigation of  
18 activity that included illegal money transmitting, mail fraud, wire fraud, money  
19 laundering and cyber- and technology-enabled crimes, including romance scams and  
20 business email compromise ("BEC") scams. Among the money laundering methods  
21 detected was the practice of laundering proceeds through illegal money transmitting  
22 known as an Informal Value Transfer System ("IVTS")<sup>1</sup>. An IVTS provides security,

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23  
24 <sup>1</sup> According to a Financial Crimes Enforcement Network ("FinCEN") Advisory  
25 (Issue 33, March 2003), an "informal value transfer system" refers to any system,  
26 mechanism, or network of people that receives money for the purpose of making the  
27 funds or an equivalent value payable to a third party in another geographic location,  
28 whether or not in the same form. The transfers generally take place outside of the  
conventional banking system through non-bank financial institutions or other business  
entities whose primary business activity may not be the transmission of money. The

(footnote cont'd on next page)

1 anonymity, and versatility to users, and is attractive to criminals due to its cost  
2 effectiveness, efficiency, reliability, lack of bureaucracy, lack of paper trail and ability to  
3 avoid scrutiny from taxing authorities and law enforcement.

4 9. Beginning no later than May 9, 2017, and continuing to at least November  
5 1, 2017, accounts held in the names of Dianwei Wang (“Wang”), Zhili Song (“Song”)  
6 and their associated businesses, including Song’s Oneworld (collectively, the “Subject  
7 Accounts”), received funds from numerous third-parties, which funds were traceable to  
8 victims of romance scams and other social engineering schemes perpetrated against U.S.  
9 and foreign victims, or were retransmitted by money mules involved in the scams.

#### 10 *Romance Scams*

11 10. A romance scam, also known as “confidence scam,” occurs when a person  
12 deceives a victim into believing they have a trust relationship—whether familial,  
13 friendly, or romantic—and leverages the relationship to persuade the victim to send  
14 money, provide personal and financial information, or purchase items of value for the  
15 violator. Violators often use online dating sites to pose as U.S. citizens located in a  
16 foreign country, U.S. military members deployed overseas, or U.S. business owners  
17 seeking assistance with lucrative investments. In some cases, the victim is persuaded to  
18 launder money on behalf of the violator.

19 11. Victims of romance scams often do not recognize that they are being  
20 defrauded for many months or more, and sometimes never recognize that they have been  
21 defrauded, because they are, or believe they are, in love with the person making the false  
22 romantic overtures or promises to them. Therefore, it is not uncommon to observe  
23 multiple wires and transfers being sent to the same beneficiary or multiple beneficiaries  
24

25 IVTS transactions occasionally interconnect with formal banking systems (for example,  
26 through the use of bank accounts held by the IVTS operator). Contemporary IVTS  
27 operations often involve the use of traditional financial institutions to complete the  
28 process. Depending on the ethnic group, IVTS are called by a variety of names  
including, for example, “hawala” (Middle East); “fei ch’ien” (China); and “Black Market  
Peso Exchange” (Latin America).

1 over a period of time. Some victims of romance scams are not completely truthful with,  
2 or seek to impede law enforcement officers who question them about the money they  
3 have transferred, in part to protect their purported romantic partner or friend. Some  
4 victims of romance scams become “mules” by agreeing to receive and retransfer funds  
5 that are the proceeds of other frauds at the instruction of their supposed romantic partner.

6 *BEC Scams*

7 12. A business email compromise (BEC) scam, also known as “CEO Fraud,” is  
8 a sophisticated fraud scheme that targets businesses and organizations by inducing  
9 employees with access to the targeted organization’s payment systems to make wire  
10 transfers to bank accounts falsely represented to be those of a trusted business party,  
11 except the account is actually controlled by the fraudsters.

12 *Illegal Money Transmitting and Money Service Businesses*

13 13. 31 C.F.R. § 1010.100(ff) defines a money services business (“MSB”) as a  
14 “person, wherever located, doing business, whether or not on a regular basis or as an  
15 organized or licensed business concern, wholly or in substantial part within the United  
16 States, in one or more of the capacities listed in paragraphs (ff)(1) through (ff)(7) of this  
17 section.” Pursuant to Section 1010.100(ff)(5), the definition of MSB includes persons  
18 who provide “money transmission services,” further defined as “the acceptance of  
19 currency, funds, or other value that substitutes for currency from one person and the  
20 transmission of currency, funds, or other value that substitutes for currency to another  
21 location or person by any means. ‘Any means’ includes, but is not limited to, . . . an  
22 informal value transfer system . . . .”

23 14. Pursuant to 18 U.S.C. § 1960(b)(1)(A), an unlicensed money services  
24 business is one that “is operated without an appropriate money transmitting license in a  
25 State where such operation is punishable as a misdemeanor under State law, whether or  
26 not the business operator knew that the operation was required to be licensed,” or fails to  
27 comply with federal regulations requiring registration of such businesses.

28 15. The MSB registration requirement is found at 18 U.S.C. §§ 1960(a) and

1 (b)(1)(B), which make it a crime to conduct similar activities or own such a business  
2 without registering with the FinCEN. Specifically, 31 C.F.R. § 1022.380(a) generally  
3 requires each MSB (whether or not licensed as a money service business by any State) to  
4 register with FinCEN.

5 16. In California, money transmitters are also required to be licensed. Cal. Fin.  
6 Code § 2000, et seq. The Department of Business Oversight is the California state  
7 agency responsible for issuing licenses for businesses who desire to operate as money  
8 transmitting businesses in California. The California Department of Business Oversight  
9 Directory of Money Transmitters records do not reflect Wang, Song, Ji or Oneworld as  
10 licensed money transmitting businesses in the state of California. Similarly, FinCEN  
11 MSB Registrant records do not reflect Wang, Song, Ji or Oneworld registered as a  
12 money transmitting businesses, meaning they did not comply with federal regulations  
13 regarding the registration of money transmitting businesses were not at any relevant time  
14 registered with the Financial Crimes Enforcement Network, as required by 31 U.S.C. §  
15 5330, and were not licensed in the state of California.

16 17. MSBs are not only required to be licensed and registered, but must comply  
17 with Bank Secrecy Act anti-money laundering regulations, such as filing required Form  
18 8300 Reports of Cash Payments Over \$10,000 Received in a Trade or Business, which  
19 identifies persons involved in large currency transactions. In addition, MSBs must file  
20 FinCEN Form 104 (CTR) for each deposit, withdrawal, exchange of currency, or other  
21 payment or transfer, by, through, or to the MSB that involves more than \$10,000 in  
22 currency. Multiple transactions must be treated as a single transaction if the MSB has  
23 knowledge that (1) they are by or on behalf of the same person; and (2) they result in  
24 more than \$10,000 in currency either having been received (Cash In) or disbursed (Cash  
25 Out) during any one business day. MSBs who are not licensed or registered tend not to  
26 adhere to such anti-money laundering laws and regulations.

27 *Illegal Proceeds Deposited into the Oneworld Account*

28 18. On or about June 1, 2017, an account was opened at Comerica Bank in the

1 name of Oneworld Financial Holding Group (“Oneworld Account”) with a \$1,000 cash  
2 deposit. The authorized signatory was Song, who opened the Oneworld Account in  
3 person at the Comerica branch located at 13200 Crossroads Pkwy North, La Puente, CA,  
4 in Los Angeles County. At the time of account opening, Song produced an Illinois  
5 driver’s license.

6 19. California Secretary of State records for Oneworld reflect that the Articles  
7 of Incorporation were filed on March 20, 2017 with Song listed as the agent for service  
8 of process at a residential address in West Covina, and the Statement of Information was  
9 filed on June 19, 2020 with Song listed as CEO, Secretary, CFO and Director. No other  
10 individuals were listed.

11 20. Between June 2 and August 7, 2017, the Oneworld Account received 19  
12 wire transfers totaling approximately \$900,000. On November 20, 2017, the balance in  
13 the account was \$63,353.86 (*i.e.*, defendant bank funds) which the FBI seized pursuant  
14 to a federal seizure warrant.

15 21. Based on law enforcement’s review of bank records and interviews of  
16 depositors and bank investigators, the majority (approximately \$498,850) of the funds  
17 deposited into the Oneworld Account were fraudulently obtained from victims of  
18 romance scams, BEC scams, and other social engineering schemes perpetrated against  
19 numerous U.S. and foreign victims, and the Oneworld Account was being used to both  
20 launder fraud proceeds and operate an illegal MSB. Below is a summary of some of the  
21 interviews.

22 *Funds from J.K.*

23 22. On or about July 11, 2017, the Oneworld Account received an incoming  
24 wire of \$32,200 from a Union Bank account (“J.K. Account”), held jointly in the names  
25 of J.K. and her son. J.K. resides in West Los Angeles, California.

26 23. J.K. stated that she fell victim to a romance scam and has sent multiple wire  
27 transfers, totaling over \$153,900, to multiple individuals.

28 24. In June 2017, J.K. met a person who identified himself as David Edwardo

1 Hicks (“Hicks”) on Match.com, a dating website. Hicks provided J.K. with his private  
2 email address and J.K. and Hicks started communicating through email. J.K. stated that  
3 Hicks was “romantic but possessive” in his emails to her, and even referred to J.K. as his  
4 fiancé. Hicks told J.K. that he was a colonel in the U.S. Army stationed in Afghanistan.  
5 Hicks first asked J.K. to send him \$4,710 to purchase a satellite phone. J.K. ordered a  
6 bank wire transfer for \$4,710 from J.K.’s account at Chase Bank to a Bank of Texas  
7 account, on Hicks’ instructions.

8 25. Hicks then asked J.K. to pay for his leave from military duties so he could  
9 visit J.K. in person, by transferring \$32,200 into the Oneworld Account. Hicks stated  
10 that Oneworld was a diplomatic agency, and Hicks would be granted leave upon transfer  
11 of the funds.

12 26. On or about July 11, 2017, J.K. went to a Union Bank branch located in  
13 Marina Del Rey, California, and authorized a wire transfer of \$32,200 from the J.K.  
14 Account to the Oneworld Account, for the benefit of Oneworld. After J.K. wired the  
15 money, Hicks advised that he would not be able to take the flight to the U.S. due to a  
16 paperwork delay.

17 27. Hicks subsequently made two additional wire requests of J.K. in connection  
18 with Hicks’ purported leave request. As instructed, J.K. sent two additional wires, in the  
19 respective amounts of \$67,100 and \$54,600, from the J.K. Account to a Bank of America  
20 account ending in 1458. After J.K. sent the wires, Hicks advised that his travel was  
21 delayed again.

22 *Funds from D.T.*

23 28. D.T. was a victim of an online romance scam. D.T. met her “boyfriend” on  
24 the internet, never in person. D.T. told a FirstBank of Nebraska (“FirstBank”)  
25 investigator that her online boyfriend was working on a pipeline in South Africa.  
26 FirstBank reported that D.T. was initiating suspicious wire transfers to multiple third-  
27 party beneficiaries, including a Bank of America account ending in 7795 (“BofA  
28 Account 7795”).



1           29. On or about July 10, 2017, \$7,400 was wire transferred from D.T.'s  
2 FirstBank account to the Oneworld Account. On or about July 12, 2017, D.T. took out  
3 an \$8,000 loan from Countryside Bank and, on the following day, D.T. requested that  
4 \$7,500 be wire transferred from D.T. Countryside Account to the Oneworld Account.  
5 Ultimately, the \$7,500 wire was not credited to the Oneworld Account. On or about July  
6 20, 2017, D.T. requested a wire transfer of \$50,000 to be deposited into a Bank of  
7 America account. When the wire request was rejected due to incorrect wire information,  
8 D.T. provided Countryside with the Oneworld Account to wire the \$50,000 to, and  
9 \$50,000 was successfully wired to the Oneworld Account from the D.T. Countryside  
10 Account.

11           30. On or about July 25, 2017, at her online boyfriend's request, D.T. requested  
12 a wire transfer in the amount of \$60,000 be sent to a Cathay Account held in the name of  
13 Xue Ji (Ji's Cathay Account). Bank records reflect that the \$60,000 was successfully  
14 wired into Ji's Cathay Account from the D.T. Account.

15           *Xue Ji's Subject Accounts*

16           31. During this ongoing investigation, investigators learned that Xue Ji ("Ji")  
17 had at least two bank accounts that received significant proceeds from Wang and Song  
18 traceable to fraud victims.

19           32. On or about August 2, 2017, Ji's HSBC Account was opened by Ji in her  
20 own name. On the same day, \$120,000 was transferred from an HSBC Account ending  
21 in 2608, held in the name of Wang ("Wang's HSBC Account"), to Ji's HSBC Account.  
22 No other deposit or withdrawal activity is reflected in records for Ji's HSBC Account.  
23 In other words, Ji's HSBC Account was funded entirely by monies transferred from  
24 Wang's HSBC Account.

25           33. On or about May 22, 2017, Ji's Cathay Account was opened with a deposit  
26 of \$555. There was no further substantial activity in the account until July 25, 2017,  
27 when D.T. incoming \$60,000 wire was deposited into the account. When a Countryside  
28 employee told D.T. they were looking out so that D.T. was not getting scammed, D.T.



1 said the funds were being wired to Ji for an investment. In an interview with the FBI, Ji  
2 said she did not know D.T. and did not know why D.T. wired funds to Ji's Cathay  
3 Account.

4 *Song Falsely Stated to FBI Agents That He and Ji Were Buying a House Together*

5 34. On or about July 26, 2017 and August 3, 2017, Ji's Cathay Account  
6 received incoming wires from the Oneworld Account in the amounts of \$40,000 and  
7 \$60,000, respectively.

8 35. On December 13, 2017, FBI agents and a Chinese interpreter, interviewed  
9 Song and below is a summary of the interview, in substance and in part.

10 36. Song stated he had invested in bitcoins in China. The wires into the Subject  
11 Accounts were from the sale of bitcoins he had arranged to sell through Wang. For  
12 example, Song stated the wires from J.K. and D.T. were proceeds from the sale of  
13 bitcoins.

14 37. Song stated that he wired funds to Ji's Cathay Bank account from the  
15 Oneworld Account to purchase a house together as an investment. Song was lending  
16 money to Ji. Song stated Wang was also investing in the same house with Ji and Song.

17 *Statements Made by Ji*

18 38. On December 13, 2017, FBI agents and a Chinese interpreter, interviewed  
19 Ji. On or about April 5, 2018, Ji also provided a sworn affidavit regarding Ji's HSBC  
20 Account. Below is a summary of Ji's statements, in substance and in part.

21 39. Ji admitted that she was an IVTS customer.

22 40. Ji reported that she is a Chinese citizen attending a Southern California  
23 university and is unemployed. Ji reported that she is married to another Chinese citizen  
24 who is also a student.

25 41. Ji admitted that she hired Song to facilitate money transfers from her family  
26 in China to her in the United States, by means other than legal international bank  
27 transfers, in order to circumvent the Chinese regulations that limits Chinese citizens to  
28 exporting from China a maximum total annual quota equivalent to USD \$50,000 per

1 person each year. Song instructed Ji to have her family in China transfer funds into  
2 Song's Hong Kong based bank accounts, after which Song would arrange for the money  
3 to get to Ji in the U.S. with the expectation that Ji would receive the approximate  
4 equivalent funds in the U.S., minus a fee.

5 42. Ji admitted that she opened both Ji's HSBC Account and Ji's Cathay  
6 Account, and that the funds deposited into the accounts were the results of her  
7 arrangement with Song.

8 43. Agents showed Ji a list of transactions in Ji's Cathay Account totaling  
9 \$214,000 in incoming wire transfers and cash deposits, including the July 25, 2017  
10 \$60,000 wire transfer from victim D.T. Ji indicated that all the deposits and wires into  
11 Ji's Cathay Account constituted funds her parents in China were attempting to send to Ji  
12 for the purpose of purchasing a house in the United States. Ji stated she did not know  
13 the individual remitters who wired money to her accounts, or the reason why they were  
14 wiring the funds to her accounts.

15 44. During the interview, Ji received a telephone call from Wang. Wang called  
16 Ji to tell her that the FBI may be coming to speak with her and he asked her to confirm  
17 that they were buying a house in partnership with him. When Ji asked why she would lie  
18 to the FBI, Wang explained that the transactions into Ji's account may be considered  
19 money laundering.

20 45. During the interview, Ji placed a telephone call to Song. Song told Ji to tell  
21 the FBI that the money in Ji's HSBC Account was for the purchase of a house in  
22 partnership with Wang. Song also instructed Ji to tell the FBI that Ji's Cathay Account  
23 transactions were for the purchase of another property.

24 46. Ji denied she was purchasing a house with Wang. Ji stated Wang lied to the  
25 FBI about purchasing a property with Ji.

26 *Related Criminal Matter*

27 47. On August 30, 2018, a grand jury in the Central District of California  
28 returned an Indictment in *United States of America v. Dianwei Wang and Zhili Song aka*

1 *Ethan Song*, 2:18-cr-00559-SVW, charging Wang and Song with conspiracy to obstruct  
2 justice and witness tampering, which alleges, inter alia, that they conspired to convince  
3 Ji to lie to the FBI. This indictment was under seal until on January 12, 2022, when a  
4 First Superseding Indictment was returned by a grand jury in the Central District of  
5 California against Song and Wang for violations of 18 U.S.C. § 371 (Conspiracy to  
6 Operate an Unlicensed Money Service Business); 18 U.S.C. § 1512(k) Conspiracy to  
7 Obstruct Justice (Witness Tampering); and 18 U.S.C. § 1512(b)(3) (Witness Tampering).  
8 Wang and Song remain fugitives.

9 FIRST CLAIM FOR RELIEF

10 48. Based on the above, plaintiff United States of America alleges that the  
11 defendant bank funds constitute or are derived from proceeds traceable to violations of  
12 18 U.S.C. §§ 1341 (mail fraud), and/or 1343 (wire fraud), which are specified unlawful  
13 activities as defined in 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1)(B). The defendant bank  
14 funds are therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C). To the  
15 extent that the defendant bank funds are not the actual monies directly traceable to the  
16 illegal activity identified herein, plaintiff alleges that the defendant bank funds are  
17 identical property found in the same account or place as the property involved in the  
18 specified offense, rendering the defendant bank funds subject to forfeiture pursuant to 18  
19 U.S.C. § 984.

20 SECOND CLAIM FOR RELIEF

21 49. Based on the above, plaintiff United States of America further alleges that  
22 the defendant bank funds constitute property involved in multiple transactions or  
23 attempted transactions in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i) and/or and  
24 (a)(1)(B)(i), or property traceable to such property, with the specified unlawful activity  
25 being violations of 18 U.S.C. §§ 1341 (mail fraud) and/or 1343 (wire fraud). The  
26 defendant bank funds are therefore subject to forfeiture pursuant to 18 U.S.C. §  
27 981(a)(1)(A). To the extent that the defendant funds are not the actual monies or assets  
28 directly traceable to the illegal activity identified herein, plaintiff alleges that the

1 defendant funds are identical property found in the same account or place as the property  
2 involved in the specified offense, rendering the defendant funds subject to forfeiture  
3 pursuant to 18 U.S.C. § 984.

4 THIRD CLAIM OF RELIEF

5 50. Based on the above, plaintiff United States of America further alleges that  
6 the defendant bank funds were involved in transactions or attempted transactions in  
7 violation of 18 U.S.C. § 1960. The defendant bank funds are therefore subject to  
8 forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A). To the extent that the defendant funds  
9 are not the actual monies or assets directly traceable to the illegal activity identified  
10 herein, plaintiff alleges that the defendant funds are identical property found in the same  
11 account or place as the property involved in the specified offense, rendering the  
12 defendant funds subject to forfeiture pursuant to 18 U.S.C. § 984.

13 WHEREFORE, plaintiff United States of America prays that:

- 14 (a) due process issue to enforce the forfeiture of the defendant bank funds;  
15 (b) due notice be given to all interested parties to appear and show cause why  
16 forfeiture should not be decreed;  
17 (c) this Court decree forfeiture of the defendant bank funds to the United States  
18 of America for disposition according to law; and

19 ///

1 (d) for such other and further relief as this Court may deem just and proper,  
2 together with the costs and disbursements of this action.

3 Dated: June 28, 2022

TRACY L. WILKISON  
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8 /s/Katharine Schonbachler

9 KATHARINE SCHONBACHLER  
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**VERIFICATION**

I, Lance Kim, hereby declare that:

1. I am a Special Agent with the Federal Bureau of Investigation and am the case agent for the forfeiture matter entitled United States of America v. \$63,353.86 in Bank Funds.

2. I have read the above Verified Complaint for Forfeiture and know its contents. It is based upon my own personal knowledge and reports provided to me by other law enforcement agents.

3. Everything contained in the Complaint is true and correct, to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed June 28, 2022, in Los Angeles, California.

A handwritten signature in black ink, appearing to read "Lance Kim", written over a horizontal line.

Lance Kim